

**EXHIBIT A**

**Derek C. Chen**

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**From:** Derek C. Chen  
**Sent:** Thursday, June 08, 2017 2:00 PM  
**To:** 'JULIE'  
**Cc:** Jayne L. Freeman; LaHoma Walker  
**Subject:** RE: joint status report CASE NO. 2:17-cv-00642 RSM

Ms. Dalessio,

If you wish to object to anything in "Defendant's Position", you may do so in your own position (and in many cases, your objections have already been included) so that your objections are duly noted in the record. Please let me know which numbers you would like to add objections to and I will quickly make those additions.

While we do not agree with some of things written in your position statements, we have not changed them and we ask for the same courtesy from you. Your version removed entire paragraphs from Defendant's positions which we believe help the Court understand our positions.

If you would review our version again, I think you will see that it is a true middle ground as it articulates both parties' statements in those parties' own words.

Please let me know what objections you have as soon as possible and I will make the additions. Thank you.

Sincerely,

Derek

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**From:** JULIE [mailto:juliedalessio@msn.com]  
**Sent:** Thursday, June 08, 2017 1:44 PM  
**To:** Derek C. Chen <DChen@kbmlawyers.com>  
**Cc:** Jayne L. Freeman <JFreeman@kbmlawyers.com>; LaHoma Walker <LWalker@kbmlawyers.com>  
**Subject:** Re: joint status report CASE NO. 2:17-cv-00642 RSM

unfortunately, i can't agree to submit your revision, as i've told you, i object to the inclusions of certain misleading, redundant, and irrelevant statements.

if you cannot agree to sign the attached pdf that i provided yesterday, please let me know by 2:30 pm.

thank-you  
julie dalessio  
206 324 2590

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**From:** Derek C. Chen <DChen@kbmlawyers.com>  
**Sent:** Thursday, June 8, 2017 11:42:02 AM  
**To:** JULIE  
**Cc:** Jayne L. Freeman; LaHoma Walker  
**Subject:** RE: joint status report CASE NO. 2:17-cv-00642 RSM

Ms. Dalessio,

Thank you for your edits. It is clear we have different opinions regarding this case, but the purpose of the Joint Status Report is to update the Court regarding where we are and help the court set a case schedule.

Rather than going back and forth trying to characterize each other's statements in a way that satisfies the other party, I have attached a version of the JSR that clearly lays out "Plaintiff's Position" and "Defendant's Position."

For "Plaintiff's Position", I have incorporated **word for word** your statements from the draft you sent last night (With one exception – I had to change 5(H) *slightly* because it had a statement regarding the position of "the parties" that did not make sense the way it was written.) This way, both parties have their versions of the case in the Report and the Court can proceed from there.

Please let me know by **3:00 PM** if you have any changes you would like to make to your statements/positions only. If not, please sign and return a copy so that we can file it with the Court.

We are truly just trying to make this as efficient as possible and fair to both sides. If you will not agree to sign the joint status report in this format, we will file it without your signature with an explanation of how the Joint Status Report was created (specifically, that it includes your statements from the version you indicated you were prepared to file, and our most recent statements.)

Thank you for your anticipated cooperation. Please feel free to contact me if you have any questions regarding the Joint Status Report.

Sincerely,

Derek Chen

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**From:** JULIE [<mailto:juliedalessio@msn.com>]

**Sent:** Wednesday, June 07, 2017 9:33 PM

**To:** Jayne L. Freeman <[JFreeman@kbmlawyers.com](mailto:JFreeman@kbmlawyers.com)>; Derek C. Chen <[DChen@kbmlawyers.com](mailto:DChen@kbmlawyers.com)>; LaHoma Walker <[LWalker@kbmlawyers.com](mailto:LWalker@kbmlawyers.com)>

**Subject:** joint status report CASE NO. 2:17-cv-00642 RSM

Please sign and return or let me know soon if i've made any mistakes in the statements of your positions, so that I can file this tomorrow.

thanks,  
julie dalessio  
206 324 2590